

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 01-455-A
)	
ZACARIAS MOUSSAOUI)	

**MOTION FOR ACCESS BY DEFENDANT TO CLASSIFIED AND
SENSITIVE DISCOVERY AND FOR RELIEF FROM SPECIAL
ADMINISTRATIVE MEASURES CONCERNING CONFINEMENT**

COMES NOW the defendant, by counsel, and moves the Court, in the event defendant's request to proceed *pro se* is granted, for the defendant to be allowed full and complete access to classified and sensitive discovery information and to be granted relief from the SAM with regard to communication with third parties. The grounds for this Motion are set forth in the accompanying memorandum.

Respectfully submitted,

ZACARIAS MOUSSAOUI
By Counsel

/S/
Frank W. Dunham, Jr.
Federal Public Defender
Eastern District of Virginia
1650 King Street, Suite 500
Alexandria, VA 22314
(703) 600-0808

/S/
Edward B. MacMahon, Jr.
107 East Washington Street
P.O. Box 903
Middleburg, VA 20117
(540) 687-3902

/S/
Gerald T. Zerkin
Assistant Federal Public Defender
Eastern District of Virginia
830 E. Main Street, Suite 1100
Richmond, VA 23219
(804) 565-0880

/S/
Judy Clarke
Federal Defenders of
Eastern Washington and Idaho
10 N. Post, Suite 700
Spokane, WA 99201
(703) 600-0855

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion for Access by Defendant to Classified and Sensitive Discovery and for Relief from Special Administrative Measures Concerning Confinement was served by hand delivery upon AUSA Robert A. Spencer, AUSA David J. Novak, and AUSA Kenneth M. Karas, U.S. Attorney's Office, 2100 Jamieson Avenue, Alexandria, Virginia 22314 this 7th day of June, 2002.

/S/
Frank W. Dunham, Jr.